public policy. The court said, "The appearance of their messenger throws caution to the winds and opens almost every door. May it admit with impunity, a thief, a murderer, or a rapist?" It seems advisable to place such decisions squarely on the ground of public policy and thus to avoid any misapplication of the principles regarding master and servant. See 2 ILL. L. REV. 553; 9 MICH. L. REV. 87; 9 *id.* 181.

MUNICIPAL CORPORATIONS—ORDINANCE REGARDING DANCE MUSIC.—Petitioner was imprisoned for violating an ordinance prohibiting after 10 p. m. dancing or dance-music in a room or hall within twenty-five feet of a residence. Upon habeas corpus proceedings, the ordinance was *held* invalid as being unreasonable and oppressive and violative of the Fourteenth Amendment. *Ex parte Hall,* (Cal. App., 1920), 195 Pac. 975.

Municipalities have a large discretion in the enactment of ordinances, and an ordinance enacted under the police power will not be declared void, unless it is clearly oppressive and unreasonable. DILLON, MUNICIPAL CORPORATIONS, [5th Ed.], 928. It is not possible to adopt a uniform and universal rule saying when an ordinance is unreasonable, and each case must be determined on its own facts. An ordinance requiring all places of business to close at 6 p. m. was held invalid in *Ex parte Harrell,* (Fla.), 79 So. 166, and a similar ordinance was declared invalid in *Saville* v. *Corless,* 46 Utah 495. A curfew ordinance prohibiting persons under 21 from being on the streets after 9 p. m., unless with parent or guardian, is an unreasonable exercise of the police power. *Ex parte McCarver,* 39 Tex. Cr. R. 448. In *Barbier* v. *Connolly,* 131 U. S. 27, the court sustained an ordinance prohibiting washing and ironing in public laundries after 10 p. m., but the danger of fires furnished a proper basis for the police power. The same considerations are involved in the principal case where dancing would be prohibited in private dwellings after 10 p. m. In commenting upon the unreasonableness of the ordinance the court said, "It should be remembered that even in these days of bizarre extremes and freak abnormalities, the muscle-tickling jazz has not yet succeeded in entirely excluding all sane dance music from the places where the devotees of Terpsichore are wont to foregather." A city has the power to require licenses for dance-halls. *Conley* v. *Buffalo,* 119 N. Y. Supp. 87; *Mehlos* v. *Milwaukee,* 156 Wis. 591. It must be noted, however, that licensing is sustained on a power to guard the public morals. The playing of a piano accompanied by dancing and loud noises, until 10 p. m. is a nuisance that will warrant a temporary injunction. *Feeney* v. *Bartaldo,* (N. J. Ch.), 30 Atl. 1101. Public picnics and open air dances within limits of a village cannot be declared nuisances in themselves under a power to define nuisances. *Des Plaines* v. *Poyer,* 123 Ill. 348. A license for police regulation cannot be required of a dancing school where it is not required of dance halls generally. *People ex. rel. Duryea* v. *Wilber,* 198 N. Y. 1. See also 27 L. R. A. (N. S.) 357.